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June 9, 2010

Mr. James J. Hahnenberg
Remedial Project Manager
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard, SR-6J
Chicago, IL 60604-3590

**Re: Monthly Progress Report for May 2010, North Bronson Industrial Area Site
Operable Unit 1, Bronson, Michigan**

Dear Mr. Hahnenberg:

The North Bronson Potentially Responsible Parties Group (the Group) submits this monthly progress report to the U.S. Environmental Protection Agency (USEPA), Region 5, pursuant to Article X, Paragraph 31, of the Consent Decree for Remedial Design and Remedial Action (RD/RA) of Operable Unit 1 at the North Bronson Industrial Area (NBIA) Site (the Consent Decree). This report summarizes efforts by the Group to fulfill the requirements of the Consent Decree during May 2010.

1. Activities Completed During This Reporting Period

- A. On May 10, 2010, the Group submitted the April 2010 monthly progress report to USEPA with copies to the Michigan Department of Natural Resources & Environment (MDNRE).
- B. O'Brien & Gere, Inc. (O'Brien & Gere) completed the vertical aquifer profiling (VAP) and monitoring well installation for completion of the Western Lagoon Area Groundwater Delineation Study.
- C. In cooperation with the City, the Group installed water line connections for two residences in the City of Bronson.
- D. TestAmerica Laboratories, Inc. (TestAmerica) completed the analyses of the sediment and soil sampling data collected pursuant to the approved *County*

Drain #30 Sediment and Soil Sampling Work Plan. O'Brien & Gere is completing the validation of these laboratory data.

2. Results of Sampling and Tests and Other Data

- A. The analytical results from the VAP sampling were previously forwarded to EPA and MDNRE to facilitate decisions regarding well locations and screened intervals. A summary of these data was submitted via electronic mail on May 21, 2010. Complete data sets, including analytical laboratory reports, will be provided as part of the final Western Lagoon Groundwater delineation Study Report.
- B. The analytical laboratory data from the County Drain #30 sediment and soil sampling are currently being validated and will be submitted to EPA and MDNRE as part of the report on this sampling activity.
- C. The Group developed no other sampling or test data during the reporting period.

3. Work Plans, Procedures, and Deliverables

- A. The Group submitted no work plans, procedures, or deliverables during the reporting period.

4. Actions Projected for Next Six-Week Period

- A. On behalf of the Group, O'Brien & Gere will conduct groundwater monitoring at specified wells as part of the Western Lagoon Area Groundwater Delineation Study. This sampling is scheduled for the week of June 7, 2010. ✓
- B. In cooperation with the City, the Group plans to complete the installation of the water line connections for the last affected residence and close 11 private wells. The Group plans to submit a technical memorandum detailing the water line connections and private well closures.
- C. Pursuant to the provision of Paragraph 29 of the Consent Decree, the Group plans to submit the revised City Groundwater Ordinance to USEPA following completion of the City water connections and private well closures.
- D. On behalf of the Group, O'Brien & Gere will complete the summary report regarding sediment and soil sampling associated with County Drain #30.

- E. On behalf of the Group, O'Brien & Gere will prepare a summary report for completion of the Western Lagoon Area Groundwater Delineation Study.
- F. The Group plans to make additional contacts with landowners to discuss environmental restrictive covenants for potentially affected properties in Bronson Township.

5. Progress and Schedule Report

- A. Near-term milestones for on-going Group activities are as follows:

County Drain #30 Sediment and Soil Sampling

- Submittal of the summary report for the County Drain #30 sediment and soil sampling is currently scheduled for late June 2010. The schedule for completion has been extended by about three weeks due to additional time spent in report preparation to address cleanup standards for sediments and soils associated with County Drain #30.

Western Lagoon Area Groundwater Delineation Study

- With monitoring well sampling scheduled for early June 2010, the target date for submittal of the summary report for completion of the Western Lagoon Area Groundwater Delineation Study is the middle of July 2010. The schedule for completion has been extended by two weeks to allow the field schedule for groundwater sampling to coincide with that for residential well closures.

Private Water Connections and Well Closures

- The Group plans to complete the installation of City water line connections and closure of those private wells in June 2010. The schedule for completion has been extended by about three weeks to accommodate the residents affected by this work.

City Groundwater Ordinance

- The Group plans to submit the City groundwater restriction ordinance to USEPA in June 2010. The Group is holding submittal of this ordinance until all of the private water connections and well closures are completed.

- B. As discussed in our project review meeting of March 17, 2009 and subsequently, progress related to RD/RA for enhanced source control at the

7/17/10
- next weeks or following

by end of July

disruption of properties?
total of 10
All private wells closed except for 2

Eastern and Western Lagoon Areas and County Drain #30 remediation requires resolution of appropriate cleanup standards for non-erodible soils associated with County Drain #30 and groundwater-to-surface water interface criteria.

- C. There are currently no other unresolved issues that affect the performance or timing of pre-design or RD activities.

6. Summary of Proposed or Approved Changes to the Work Plans or Schedules

- A. The work plans for the County Drain #30 sediment and soil sampling and the Western Lagoon Area Groundwater Delineation Study include addenda to the Pre-Design Studies Field Sampling and Quality Assurance Plan. These addenda provide for additional sampling and analytical protocols associated with those efforts. These work plans also include addenda to the site Health and Safety Plan as needed to address task-specific health and safety issues.
- B. The near-term milestones associated with the most-recent working schedule update are those identified in Item 5.A above.

7. Activities Undertaken in Support of the Community Relations Plan

- A. Group representatives met with affected residents regarding City water connections and private well closures.
- A. Group representatives coordinated with affected landowners regarding access and crop damage payments with respect to drilling and sampling activities for completion of the Western Lagoon Area Groundwater Delineation Study.

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We trust that this submittal satisfies your requirements at this time. If you have questions regarding this monthly progress report or related project matters, please do not hesitate to contact me.

Respectfully submitted,



Leo M. Brausch
Project Coordinator

LMB:

Mr. James J. Hahnenberg
June 9, 2010
Page 5

cc: Deborah D. Larsen, MDNRE
Charles W. Graff, MDNRE

cc (via email):
NBIA Operable Unit 1 PRP Group Legal Committee
NBIA Operable Unit 1 PRP Group Technical Committee